

1 Donald A. Nunn, Esq. SBN 54232
2 13426 Community Road
3 Poway, CA 92064
Telephone: (858)748-8612
Facsimile: (858)748-8610

4 Attorney for Defendant, RICARDO GOMEZ

5

6

7

8 UNITED STATES DISTRICT COURT

9

SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11) Case No. 07CR2902-WQH

12 Plaintiff,

13)) NOTICE OF MOTION AND

vs.

14)) MOTION TO:

15 TRACY ANN NELSON (1),
RICARDO GOMEZ (2),

16)) 1) COMPEL FURTHER DISCOVERY; AND

Defendants.

17)) 2) LEAVE TO FILE FURTHER MOTIONS

18))) DATE: 12/3/07

19)) TIME: 2:00 p.m.

20)))

21)))

22)))

23)))

24 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY and
CARLA J. BRESSLER, ASSISTANT UNITED STATES ATTORNEY:

25)))

26)))

27)))

28)))

NOTICE OF MOTION

29 PLEASE TAKE NOTICE that on December 3, 2007 at 2:00 p.m., or as soon thereafter
as Counsel may be heard, the Defendant, RICARDO GOMEZ, by and through his counsel,
Donald A. Nunn, will ask this Court to enter an order granting the motions listed below.

30 / / /

31 / / /

32)))

MOTION

RICARDO GOMEZ, the Defendant in this case, by and through his attorney, Donald A. Nunn, pursuant to the Fourth, Fifth and Sixth Amendments to the United States Constitution, Fed. R. Crim. P. 12, 16 and 26, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

- 1) Compel Discovery; and
- 2) Leave to file further motions.

This motion is based upon the instant motion and notice of motion, the attached statement of facts and memorandum of points and authorities, and any and all other matters that may come to this Court's attention prior to or at the time of the hearing on this motion.

Date: November 28, 2007

Respectfully submitted,

s/Donald A. Nunn

CERTIFICATE OF SERVICE

I, Donald A. Nunn declare that:

I am, and was at the time of service of the papers herein referred to, over the age of 18 years and not a party to this action; and I am employed in the County of San Diego, California. My business address is 13426 Community Road. Poway, California.

I caused to be served by electronic mail on November 28, 2007:

NOTICE OF MOTION AND MOTION TO COMPEL FURTHER
DISCOVERY AND FOR LEAVE TO FILE FURTHER MOTIONS

to the following:

- **Elizabeth Barros**
elizabeth_barros@fd.org,cori_cardona@fd.org
- **Wayne Charles Mayer**
wcmayer@aol.com
- **U S Attorney CR**
Efile.dkt.gc2@usdoj.gov

s/Donald A. Nunn

Donald A. Nunn,
Attorney for Defendant RICARDO GOMEZ